

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850



MEDICARE PLAN PAYMENT GROUP

DATE: June 14, 2013

TO: Program for All-Inclusive Care for the Elderly (PACE) Plans

FROM: Cheri Rice, Director
Medicare Plan Payment Group

SUBJECT: Attestation of Prescription Drug Event Data and Direct and Indirect Remuneration Data for the reopening of the 2006 Part D payment reconciliation for PACE organizations

Per 42 CFR 423.505(k)(3) and (5), Part D sponsors are required to certify the claims data and allowable costs it submits for purposes of risk corridor and reinsurance payment. In submitting the attestation in Attachment II, the Attestation of Data Relating to CMS Payment to a Medicare Part D Sponsor, the Part D sponsor certifies that Prescription Drug Event (PDE) data, Direct and Indirect Remuneration (DIR) data, and any other information provided for the purposes of determining allowable reinsurance and risk corridor costs are accurate, complete, and truthful, and acknowledges that the information will be used for purposes of obtaining federal reimbursement.

CMS was notified of an incorrect payment calculation of the 2006 reopening that occurred in 2012. The issue impacted PACE organization only. CMS is in the process of running the Part D payment reconciliation reopening for PACE organizations. The reconciliation will include PDE data submitted as of May 31, 2013; therefore, all PACE organization must complete and submit a new 2006 attestation by no later than **July 12, 2013. Part D sponsors may not substitute a revised or different attestation for this attestation.** Part D sponsors offering multiple contracts are to submit one attestation for all contracts combined. The Part D sponsor must indicate in the appropriate space or in a referenced attachment the contract numbers (H numbers, E numbers, R numbers and/or S numbers) which the sponsor offered and for which the sponsor is certifying. The attestation must be signed by the CEO, CFO, or an individual delegated the authority to sign on behalf of one of these officers and who reports directly to one of these officers. The signed attestation must be scanned as a pdf document and sent via e-mail to StrategicHealthSolutions, LLC (Strategic) at partdpaymentreview@strategichs.com. **A signed copy of this attestation is required to receive any payment adjustment resulting from the reopening of the 2006 Part D payment reconciliation.**

PACE organizations will not be required to complete the Attestation of Plan-to-Plan (P2P) Reconciliation Payment Data and the 2006 Record of P2P Reconciliation Payments. For the

2006 reopening, CMS will use the P2P data that was submitted and attested to in the previous reopening of the benefit year 2006 Part D payment reconciliation.

Please see Attachment I for detailed instructions on completing the attestation. Attachment II is the actual attestation that must be completed and submitted electronically to Strategic. Questions concerning this attestation should be directed to Strategic at PartDPaymentReview@strategichs.com.

Attachments (2)

**ATTACHMENT I: Instructions for Submitting the Attestation of Data Relating to CMS
Payment to a Medicare Part D sponsor
(Due by July 12, 2013)**

All Part D sponsors who offered an active Part D plan in 2006 **must** complete and submit the attestation to Strategic. This request is limited to PACE organizations. The attestation is provided in Attachment II and cannot be accessed through the Health Plan Management System (HPMS) Part D Payment Reconciliation Attestations module.

Please Note: This attestation may not be substituted or revised. In the case that a Part D sponsor is aware of an error or potential error in the PDE records submitted to CMS for contract year 2006, has notified CMS of this error, and is working to rectify this error, the Part D sponsor may add an attachment to this attestation which describes the error, when the error was identified, the magnitude of the error, and the timeline and expectations for resolving this problem. The Part D sponsor must also indicate that CMS has received prior notification of the identified or potential error. Attestations that are substituted or revised will not be considered complete and may result in payments related to the reopening of the Part D payment reconciliation to be withheld until a corrected attestation is received.

1. Save the Microsoft Word version of the 2006 Attestation of Data Relating to CMS Payment to a Medicare Part D sponsor.
2. Complete the following fields in the Microsoft Word version of the attestation that are specific to each Parent organization.
 - a. Insert Name of Medicare Part D Organization: Indicate the 2006 name of the Parent Organization. One attestation should be submitted per parent organization. Therefore, Part D sponsors offering multiple contracts should submit one attestation for all contracts combined for contract year 2006.
 - b. Insert Contract Numbers Here or Reference Attachment with Contract Numbers Listed: Indicate the contract numbers (H numbers, R numbers, E numbers, and/or S numbers) which the sponsor offered in 2006 and for which the sponsor is certifying. Part D sponsors may instead list the applicable contract numbers in a separate attachment and reference the appropriate attachment in this field.
 - c. Insert Date of DIR Report Submission Here: Indicate the date that the most recent DIR Report for Payment Reconciliation for contract year 2006 was successfully submitted to CMS via HPMS. This date can be verified by accessing the DIR Reports link on the DIR Reporting Contract Year 2006 Start Page.
 - d. Printed Name: Indicate the name of the signer of the attestation. The name of the signer must be printed.
 - e. Title: Indicate the title of the signer, either CEO, CFO, or delegate. This attestation must be signed by the CEO, CFO, or an individual delegated the authority to sign on behalf of one of these officers and who reports directly to one of these officers.
 - f. Date: Indicate the date the attestation is signed by the CEO, CFO, or delegate.
3. Signature: Once the above information is completed, the attestation must be printed and

signed by the CEO, CFO, or delegate.

4. The signed document must be scanned and sent electronically as a pdf file to Strategic at PartDPaymentReview@strategichs.com.